

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TEXAS

SHERMAN DIVISION

UNITED STATES OF AMERICA

V.

LASHONDA MOORE

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NO. 4:23CR243
(Judge Mazzant)

**MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES,
CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS;

COMES NOW, Defendant LASHONDA MOORE, by and through her undersigned
attorney, and files this, her MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES,
CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE, and would
show this Honorable Court as follows, to-wit:

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PROCEDURAL HISTORY

On the 8th day of November 2023, Defendant was indicted in a nine-count indictment
alleging a violation of 18 U.S.C. § 1349 (Conspiracy), five separate violations of 18 U.S.C. § 1343
(Wire Fraud), and three separate violations of 18 U.S.C. § 1957 (Money Laundering). On or about
November 20th, 2023, Defendant appeared before United States Magistrate Aileen Durrett, for an
Initial Appearance and Arraignment on the instant indictment. At that time, the Office of the

Federal Public Defender for the Eastern District of Texas was appointed to represent the Defendant. The Pretrial Order relating to Pretrial Discovery and Inspection was filed, and the order imposed a deadline of December 15, 2023, for a change of plea by the Defendant and scheduled a Final Pretrial Conference for January 5, 2023.

GROUND FOR MOTION

Defense counsel is currently in the process of receiving and reviewing discovery. Because of the nature of the offense and the possible punishment, defense counsel must then carefully review the evidence with the Defendant and ensure that all questions are answered. In addition, there are issues that defense counsel wishes to discuss with the government and present to the Defendant. Defendant respectfully requests additional time to discuss the case with counsel for the government and ensure that all evidence is reviewed to make a fully informed decision. This request is made to ensure that effective assistance of counsel is provided to the Defendant.

Due to the reason outlined above, Defendant respectfully requests an additional 60 days for the pretrial motion dates, change of plea deadline, and final pretrial conference date.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully requests that the pretrial motion dates, change of plea deadline, and final pretrial conference date in this case be reset from their current setting.

/s/ Michael Pannitto
MICHAEL PANNITTO
State Bar No. 6274129
Assistant Federal Defender
Federal Defender's Office
600 E. Taylor St, Suite 4000
Sherman, Texas 75034
903/892-4448
903/892/4808 (FAX)

Attorney for Defendant

CERTIFICATE OF CONFERENCE

Defense counsel contacted Assistant United States Attorney, Sean Taylor, and all counsel for co-defendants. There is no opposition to this motion.

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of December, a true and correct copy of the foregoing Defendant's MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES, CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE was sent by CM/ECF to:

Sean Taylor
600 East Taylor, Suite 2000
Sherman, TX 75090

/s/ Michael Pannitto
Attorney for Defendant